Comments on WT Docket 04-140
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Amateur Station Frequency Privileges, High Frequency Privileges (paragraph 7)

I agree with the ARRL proposal regarding "re-farming" the HF bands. While increased space for phone operation seems justified, I think it is likewise imperative that CW incentive sub-bands be maintained.

Vanity Call Sign System, In Memoriam Provisions (paragraph 48)

I agree with the QCWA proposal. It seems obvious that allowing the licensee to make such a bequest ensures that their desires are respected without burdening their survivors. What is permitted post mortem should be permitted ante mortem.

Vanity Call Sign System, Multiple Applications (paragraph 52)

I agree with the Edwards, Lynch, and Young proposal to limit applications to one per applicant per call. If a lottery system is required to allocate desirable call signs, it should be equitable. Allowing multiple applications amounts to ballot box stuffing with some applicants essentially able to buy the selection. Recently the Commission has taken enforcement action against licensees accused of manipulating the call sign system by applying for multiple club station calls and repeatedly filing for different vanity calls. It seems to me that filing multiple applications for the same call sign amounts to the same type of abuse.

Morse Code Exam Credit, Section 97.505(a)(9) (paragraph 92)

I agree with the Commissions proposal regarding code element credit. Since the Rules grant HF privileges to Technicians who have credit for passing a Morse code examination, we have essentially re-created the Tech plus license without the formal grant. Applicants who passed a Morse test after February 14, 1991, have demonstrated the same level of competence as those who did so before that date. They are denied credit for that accomplishment only because of a Commission decision to stop granting new Tech Plus licenses. Since that class have been de facto recreated, it seems appropriate to grant them the appropriate element credit.